IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

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| In re application of: | § | Attorney Docket No. |
| | § | TSMC2002-1130 / 24061.50 |
| Hsu et al. | § | |
| | § | Customer No. 42717 |
| Serial No. 10/712,880 | § | |
| | § | Group Art Unit: 3625 |
| Filed: November 13, 2003 | § | |
| | § | Examiner: Levine, Adam L. |
| For: METHOD AND SYSTEM TO LINK ORDERS WITH QUOTATIONS | § | |
| | § | |
| | § | |

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Linda Ingram
Name

## APPEAL BRIEF

In response to the Notice of Panel Decision from Pre-Appeal Brief Review dated August 9, 2006, Appellants submit this Appeal Brief in connection with an appeal from the final rejection of the Examiner, dated April 7, 2006, finally rejecting claims 1, 2, 4-12, 14-20, and 22-34, all of the pending claims in this application.

## REAL PARTY IN INTEREST

The real party in interest is Taiwan Semiconductor Manufacturing Company, a Taiwanese company having a principal office and place of business at No. 8, Li-Hsin Rd. 6, Science-Based Industrial Park, Hsin-Chu, Taiwan 300-77, Taiwan R.O.C.

## RELATED APPEALS AND INTERFERENCES

There are no related appeals and no related interferences regarding the above-identified patent application.

## STATUS OF CLAIMS

Claims 1, 2, 4-12, 14-20, and 22-34 are pending, stand finally rejected, and are on appeal here. Claims 1, 2, 4-12, 14-20, and 22-34 are set forth in the Claims Appendix attached hereto.

**STATUS OF AMENDMENTS AFTER FINAL REJECTION**

No amendments have been made after the Final Office Action dated April 7, 2006.

## SUMMARY OF THE CLAIM SUBJECT MATTER

The present invention, as set forth in independent claim 1, relates to a computer-implemented method for linking a semiconductor product manufacturing facility order with a quotation (paragraph 27, line 1-15), the method comprising: receiving the quotation including at least a first product and its quote amount (paragraph 27, lines 4-5); storing the quote amount associated with the first product in a quotation database (paragraph 27, lines 7-8); storing predetermined information associated with the first product in a product database (paragraph 28, lines 1-3); updating a mapping database record associated with the first product with the predetermined information from the quotation database and the product database associated with the first product (paragraph 28, lines 3-5), wherein the mapping database associates information of the quotation from the quotation database with information of the first product from the product database (paragraph 22, lines 1-15); receiving the product manufacturing facility order that identifies at least the first product and desired quantity (paragraph 30, lines 2-3); retrieving a mapping database record associated with the first product from the mapping database (paragraph 30, lines 4-5); and calculating an order price based on the mapping database record comprising the quote amount associated with the first product, and the desired quantity identified in the product manufacturing facility order (paragraph 30, lines 7-9).

Another embodiment, as set forth in independent claim 11, relates to a computer-implemented method for linking a semiconductor product manufacturing facility order with a quotation (paragraph 27, line 1-15), the method comprising: receiving the quotation including at least two products and their respective quote amounts (paragraph 27, lines 4-5); storing the two quote amounts of the at least two products in a quotation database (paragraph 27, lines 7-8); storing predetermined information associated with a first product and a second product of the at least two products in respective product database records in a product database (paragraph 28, lines 1-3); updating respective mapping database records in a mapping database with the predetermined information from the quotation database records and the respective product database records associated with the first product and the second product (paragraph 28, lines 3-5), wherein the mapping database associates information of the quotation from the quotation database with information of the at least two products from the product database (paragraph 22, lines 1-15); receiving the product manufacturing facility order that identifies at least the two

products and their respective desired quantities (paragraph 30, lines 2-3); retrieving the respective mapping database records from the mapping database (paragraph 30, lines 4-5); and calculating a total order price based on the respective mapping database records comprising the two quote amounts of the at least two products, and their respective desired quantities identified in the product manufacturing facility order (paragraph 30, lines 7-9).

Another embodiment, as set forth in independent claim 19, relates to a computer-readable medium having stored thereon sequences of instruction for responding to a request for linking a semiconductor product manufacturing facility order with a quotation (paragraph 51, lines 1-3), the sequence of instructions including instructions for performing the steps of: receiving the quotation including at least a first product and its quote amount (paragraph 27, lines 4-5); storing the quote amount in a quotation database (paragraph 27, lines 7-8); storing predetermined information associated with the first product in a product database (paragraph 28, lines 1-3); updating a mapping database record associated with the first product with the predetermined information from the quotation database and the product database associated with the first product (paragraph 28, lines 3-5); receiving the product manufacturing facility order that identifies at least the first product and desired quantity (paragraph 30, lines 2-3); retrieving a mapping database record associated with the first product from the mapping database (paragraph 30, lines 4-5); and calculating an order price based on the mapping database record comprising the quote amount associated with the first product, and the desired quantity identified in the product manufacturing facility order (paragraph 30, lines 7-9).

Another embodiment, as set forth in independent claim 26, relates to a system for linking a product manufacturing facility order with a quotation (paragraph 18, lines 1-2), the system comprising: a quotation entry device for entering the quotation that includes at least a first product and its quote amount (paragraph 24, lines 3-4); a quotation database connected to the order entry device for storing the quotation (paragraph 18, lines 2-3); a product database configured to receive product information of the first product (paragraph 21, lines 1-2); and a mapping database that interfaces with both the quotation database and the product database capable of storing quotation information associated with the first product (paragraph 22, lines 1-2); memory connected to the quotation entry device configured to receive a mapping database record associated with the first product from the mapping database (paragraph 51, lines 11-13, paragraph 30, lines 4-5); an order entry device for entering the product manufacturing facility

order that identifies at least the first ordered product and a desired quantity (paragraph 25, lines 1-5); and a price calculator configured to receive the product manufacturing facility order from the order entry device, to access the memory to identify the quote amount associated with the first ordered product from the mapping database record, and to calculate a price for the first ordered product based on the desired quantity and the quote amount (paragraph 30, lines 7-9).

**GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL**

I. Claims 1, 2, 4-12, 14-20, and 22-31 stand rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 4,799,156 to Shavit et al. ("Shavit") in view of U.S. Publication No. 2002/0161672 to Banks et al. ("Banks").

II. Claims 32-34 stand rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 4,799,156 to Shavit et al. ("Shavit") in view of U.S. Publication No. 2002/0161672 to Banks et al. ("Banks") and further in view of U.S. Publication No. 2002/0029171 to Senior ("Senior").

## ARGUMENT

The issues for the Board's consideration are

I. Whether claims 1, 2, 4-12, 14-20, and 22-31 are unpatentable under 35 U.S.C. §103(a) over Shavit in view of Banks.

II. Whether claims 32-34 are unpatentable under 35 U.S.C. §103(a) over Shavit in view of Banks and further in view of Senior.

As detailed below, the Appellants believe that the Examiner has improperly applied the combination of references to the claims. More specifically, it is Appellants' belief that the Examiner cannot factually support a prima facie case of obviousness with respect to the rejected claims because the references, even when combined, fail to teach or suggest the claimed subject matter, and that the combination of references is improper.

**Claims 1, 2, 4-12, 14-20, and 22-31**

Appellants traverse the rejection of these claims on the grounds that the references are defective in establishing a prima facie case of obviousness. It is well settled that, in order to reject a patent application for obviousness, the prior art reference must teach or suggest all of the claimed limitations. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Moreover, all words in a claim must be considered in judging the patentability of that claim against the prior art. *In re Wilson*, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970). Appellants respectfully submit that even if combined, Shavit and Banks clearly do not teach or suggest the limitations of claim 1.

With respect to the improper application of Shavit and Banks, the Appellants submit that neither Shavit and Banks, separately or in combination, teach or suggest all of the elements of claim 1 as required by MPEP § 2143. Appellants traverse the rejection of this claim on the grounds that the references are defective in establishing a prima facie case of obviousness.

Claim 1 recites:

> A computer-implemented method for linking a semiconductor product manufacturing facility order with a quotation, the method comprising:
> receiving the quotation including at least a first product and its quote amount;

storing the quote amount associated with the first product in a quotation database;

storing predetermined information associated with the first product in a product database;

updating a mapping database record associated with the first product with the predetermined information from the quotation database and the product database associated with the first product, wherein the mapping database associates information of the quotation from the quotation database with information of the first product from the product database;

receiving the product manufacturing facility order that identifies at least the first product and desired quantity;

retrieving a mapping database record associated with the first product from the mapping database; and

calculating an order price based on the mapping database record comprising the quote amount associated with the first product, and the desired quantity identified in the product manufacturing facility order.

To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.

The MPEP § 2142 provides:

> ... The examiner bears the initial burden of factually supporting any prima facie conclusion of obviousness. If the examiner does not produce a prima facie case, the applicant is under no obligation to submit evidence of nonobviousness...

It is submitted that, in the present case, the Examiner has not factually supported a prima facie case of obviousness as the references do not teach or suggest all the claim limitations.

Neither Shavit nor Banks discloses or suggests "updating a mapping database record associated with the first product with the predetermined information from the quotation database and the product database associated with the first product, wherein the mapping database associates information of the quotation from the quotation database with information of the first product from the product database." The Examiner admits in the Final Office Action that Shavit does not disclose or suggest such features, but alleges that Banks discloses these features in paragraphs 12, 18-20, and 22 and figs. 1 and 3. Fig. 1 of Banks is shown below:

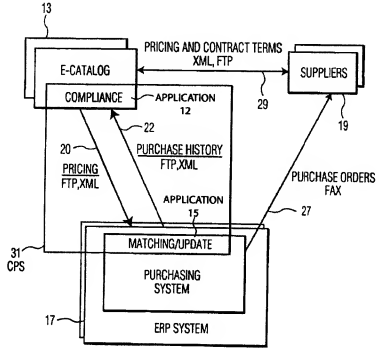


FIG. 1

In the above paragraphs and in Fig. 1, Banks discloses that "[t]he purchasing system 17 receives an initial download of purchasing contract, pricing, and associated data 20 comprising data held in the e-catalog 13 database. . . .Purchasing system 17 provides procurement database purchase history data 22 to e-catalog database system and e-catalog 13 uses this history data in recalculating pricing and in identifying off contract purchases and incorrect pricing performed by unit 17. . . .System 31 synchronizes price, vendor, product and other information between the unit 13 and 17 databases once a Catalog file from the e-Catalog unit 13 is received and loaded into a set of cross reference (data mapping) tables in the unit 17 database. This synchronization is achieved by matching information items received from unit 13 with corresponding items in unit 17 using the mapping tables and replacing matched items with updated information."

In paragraphs 31 and 32, Banks discloses that "[a]pplication 12 in step 315 processes the received product usage information to identify incorrect prices, recalculate purchase pricing of products in the product usage information, identify purchase contractual discrepancies, and identify items not covered by a purchase contract. . . . Application 12 in step 320 updates product information in the e-Catalog system 13 database based on the received product usage

information. . . .E-Catalog system 13 uses product usage information to recalculate item price information provided to purchasing system 17 based on prior product purchases."

Thus, Banks discloses a catalog database 13 that includes only product description, vendor and price information. Banks' catalog database 13 does not include quotation information from a quotation database and predetermined information from a product database, as recited in claim 1. In fact, the catalog database 13 is a product database according to Banks. In the Abstract, Banks discloses "a catalog database for maintaining product information including product description, product vendor, and associated pricing information." The catalog database 13 also does not associate information quotation information from a quotation database with product information from a product database. The catalog database 13 merely receives pricing and contracting terms from the Suppliers 19 and uses product usage information received from the purchasing system 17 to recalculate a price and identify discrepancies. For at least this reason, Shavit and Banks fail to render claim 1 *prima facie* obvious.

The Purchasing System 17 of Banks also does not include quotation information from a quotation database and predetermined information from a product database or associate information quotation information from a quotation database with product information from a product database. The Purchasing System 17 uses updated product information from the catalog database 13 to generate a purchase order for the Suppliers 19. The Purchasing System 17 does not associate the product information from the catalog database with any quotation information from a quotation database, since there is no mention of a quotation database in Banks. For at least this reason, Shavit and Banks fail to render claim 1 *prima facie* obvious.

In addition, the Examiner states in the Advisory Action that "product data is loaded into and retrieved from cross reference (data mapping) tables in the database. A table of data is the same as a database. Therefore, a data mapping table in a database is a mapping database. The records in the table are therefore mapping database records." Appellants respectfully disagree.
In paragraph 19, Banks discloses that "system 31 synchronizes price, vendor, product and other information between the unit 13 and 17 databases once a Catalog file from e-Catalog unit 13 is received and loaded into a set of cross reference (data mapping) tables in the unit 17 database." However, nowhere in the reference does Banks disclose or suggest that the data mapping tables associate quotation information from the quotation database with information of the first product from the product database, as recited in claim 1. The data mapping tables of Banks merely

comprises updated product information from the catalog database 13. No quotation information from a quotation database is provided to the data mapping tables of the Purchasing System 17. For at least this reason, Shavit and Banks fail to render claim 1 *prima facie* obvious.

With regard to the claim 1 limitation of "retrieving a mapping database record associated with the first product from the mapping database," the Examiner alleges in the Final Office Action that such features are also disclosed by Banks. Since Banks fails to disclose a mapping database that associates quotation information from a quotation database with product information from a product database, Banks would not discloses retrieve a mapping database record from such database. To the contrary, Banks merely discloses loading data into the cross reference or data mapping tables. Banks does not retrieve from the data mapping tables a mapping database record. Therefore, Banks does not disclose or suggest "retrieving a mapping database record from the mapping database," as recited in claim 1.

With regard to the claim 1 limitation of "calculating an order price based on the mapping database record comprising the quote amount associated with the first product, and the desired quantity identified in the product manufacturing facility order," the Examiner alleges in the Final Office Action that such features are also disclosed by Banks. In the Amendment After Final filed by the Appellants on July 7, 2006, Appellants submitted that Banks discloses recalculating the item price based on prior product purchase data instead of a quote amount in the mapping database record. In response, the Examiner stated in the Advisory Action that the prior product purchase price of Banks comprises the amount quoted as a price and is therefore a quote amount. Appellants respectfully disagree with the Examiner's allegation that the prior product purchase price information is the same as the quote amount.

In paragraph 29, Banks discloses "application 15 communicates product usage information comprising product purchase history data (item 22 of Fig. 1) to e-Catalog system 13 (Fig. 1)." Thus, the product usage information that is updated in the catalog database is prior product purchase history data, not a quote amount. As a person of ordinary skill in the art would recognize, a quote amount may represent an amount of a product that is quoted but not purchased. Just because a product is quoted does not necessarily mean that the product is purchased. Since the prior product purchase price information as disclosed by Banks is prior purchase history data, it is not the same as the quote amount of a mapping database record, as

recited in claim 1. For at least this reason, Shavit and Banks fail to render claim 1 *prima facie* obvious.

Furthermore, the Examiner states in the Advisory Action that Shavit discloses all the elements of the limitation except a mapping database record that comprises the quote amount from the quotation database and that it would have been obvious for one of ordinary skill in the art to include the mapping database of Banks in the market management system in order to improve the function of Shavit. Appellants respectfully disagree. As discussed above, Banks fails to disclose or suggest a mapping database that comprises quotation information from a quotation database or a quote amount. Instead, Banks' catalog database comprises product information that are synchronized with prior purchase history data provided by the Purchasing System 17. Shavit, on the other hand, merely discloses calculating bids based on a database that comprises user information, not a mapping database record that comprises a quote amount from a quotation database. Since neither Shavit nor Banks discloses or suggests a mapping database that comprises quotation information from a quotation database, one of ordinary skill in the art would not have been led to include a mapping database record that comprises a quote amount from the quotation database when calculating an order price. For at least this reason, Shavit and Banks fail to render claim 1 *prima facie* obvious.

Additionally, § 2142 of the MPEP also provides:

> *...the examiner must step backward in time and into the shoes worn by the hypothetical 'person of ordinary skill in the art' when the invention was unknown and just before it was made.....The examiner must put aside knowledge of the applicant's disclosure, refrain from using hindsight, and consider the subject matter claimed 'as a whole'.*

Here, neither Shavit nor Banks teaches, or even suggests, the desirability of the combination since neither teaches "updating a mapping database record associated with the first product with the predetermined information from the quotation database and the product database associated with the first product, wherein the mapping database associates information of the quotation from the quotation database with information of the first product from the product database," "retrieving a mapping database record associated with the first product from the mapping database," or "calculating an order price based on the mapping database record

comprising the quote amount associated with the first product, and the desired quantity identified in the product manufacturing facility order" as specified above and as claimed in claim 1.

Thus, it is clear that neither reference provides any incentive or motivation supporting the desirability of the combination. Therefore, there is simply no basis in the art for combining the references to support a 35 U.S.C. § 103 rejection.

In this context, the MPEP further provides at § 2143.01:

> *The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination.*

In the above context, the courts have repeatedly held that obviousness cannot be established by combining the teachings of the prior art to produce the claimed invention, absent some teaching, suggestion or incentive supporting the combination. In the present case it is clear that the examiner's combination arises solely from hindsight based on the invention without any showing, suggestion, incentive or motivation in either reference for the combination as applied to claim 1. Appellants submit that the Examiner has simply taken unrelated phrases from the various references and combined them using Appellants' disclosure as a blueprint without any teaching or suggestion in the references themselves.

The case law forbids this type of combination by requiring that there must be evidence that a skilled artisan, confronted with the same problems as the inventor and with no knowledge of the claimed invention, would select the elements from the cited prior art references for combination in the manner claimed. It is also clear that a rejection cannot be predicated on the mere identification of individual components of claimed limitations. Rather, particular findings must be made as to the reason the skilled artisan, with no knowledge of the claimed invention, would have selected these components for combination in the manner claimed. *Ecolochem Inc. v. Southern California Edison*, 56 USPQ2d 1065, 1076 (Fed. Cir. 2000).

Furthermore, Appellants respectfully submit that the Final Office Action simply takes bits and pieces of information from each reference and pieces them together like a jigsaw puzzle using the Appellants' disclosure as a blueprint. However, the case law makes it clear that the best defense against hindsight-based obviousness analysis is the rigorous application of the requirement for a showing of a teaching or motivation to combine the prior art references. See *Dembiczak*, 50 USPQ2d, 1614, 1617 (Fed. Cir. 1999). "Combining prior art references without

evidence of such a suggestion, teaching, or motivation simply takes the inventor's disclosure as a blueprint for piecing together the prior art to defeat patentability – the essence of hindsight." *Id.* It is respectfully submitted that the only way the cited references could be pieced together to defeat patentability is indeed to use Appellants' disclosure as a blueprint. For at least this reason, Shavit and Banks fail to render claim 1 *prima facie* obvious

Independent claim 19 recites similar features as claim 1. Claims 2, 4-10, 20, and 22-25 depend from, and further limit, claims 1 and 19. Therefore, the same distinctions between Shavit and Banks and the claimed invention in claims 1 and 19 applies for claims 2, 4-10, 20, and 22-25. For at least this reason, the Examiner has failed to provide a prima facie case of obviousness with regard to claims 2, 4-10, 20, and 22-25.

With regard to independent claim 11, neither Shavit nor Banks discloses or suggests "updating respective mapping database records in a mapping database with the predetermined information from the quotation database records and the respective product database records associated with the first product and the second product, wherein the mapping database associates information of the quotation from the quotation database with information of the at least two products from the product database," "retrieving the respective mapping database records from the mapping database," or "calculating a total order price based on the respective mapping database records comprising the two quote amounts of the at least two products, and their respective desired quantities identified in the product manufacturing facility order."

As discussed above, Banks fails to disclose or suggest a mapping database that associates information of quotation from a quotation database with product information from a product database. Instead, Banks' catalog system merely comprises product information. There is no mention of a mapping database that comprises quotation information of a quotation database. Similarly, Banks fails to disclose or suggest retrieving mapping database records from the mapping database, since Banks merely discloses loading data into the data mapping tables.

Furthermore, Banks fails to disclose or suggest "calculating a total order price based on the respective mapping database records comprising the two quote amounts of the at least two products." Since Banks uses prior product purchase data instead of a quote amount from a mapping database record to recalculate an item price, Banks does not disclose or suggest calculating a total order price based on the mapping database records comprise two quote

amounts of the two products. For at least this reason, Shavit and Banks fail to render claim 11 *prima facie* obvious

Claims 12, 14-18 depend from, and further limit, claim 11. Therefore, the same distinctions between Shavit and Banks and the claimed invention in claim 11 applies for claims 12, 14-18. For at least this reason, the Examiner has failed to provide a prima facie case of obviousness with regard to claims 12, 14-18.

With regard to independent claim 26, neither Shavit nor Banks discloses or suggests " a mapping database that interfaces with both the quotation database and the product database capable of storing quotation information associated with the first product," "memory connected to the quotation entry device configured to receive a mapping database record associated with the first product from the mapping database," or "a price calculator configured to access the memory to identify the quote amount associated with the first ordered product from the mapping database record, and to calculate a price for the first ordered product based on the desired quantity and the quote amount."

Banks fails to disclose or suggest "a mapping database that interfaces with both the quotation database and the product database capable of storing quotation information associated with the first product." Banks merely discloses a catalog database that comprises product information. There is no mention of storing quotation information of a quotation database in Banks. In addition, neither the catalog database 13 nor the Purchasing System 17 interfaces with both a quotation database and a product database. The catalog database 13 interfaces with the Suppliers 19 and the Purchasing System 17. The Purchasing System 17 interfaces with the catalog database 13 and the Suppliers. None of which serves as a quotation database.

Furthermore, Banks fails to disclose or suggest "receive a mapping database record associated with the first product from the mapping database." Since Banks fails to disclose or suggest a mapping database, Banks would not disclose or suggest receiving a mapping database record from the mapping database. In addition, Banks loads data into data mapping tables instead of retrieve mapping database record from the mapping database. Moreover, Banks fails to disclose or suggest "a price calculator configured to access the memory to identify the quote amount associated with the first ordered product from the mapping database record." Since Banks fails to disclose or suggest a mapping database record that comprises a quote amount, Banks would not disclose or suggest a price calculator that is configured to identify the quote

amount from the mapping database record. For at least this reason, Shavit and Banks fail to render claim 26 *prima facie* obvious

Claims 27-31 depend from, and further limit, claim 26. Therefore, the same distinctions between Shavit and Banks and the claimed invention in claim 26 applies for claims 27-31. For at least this reason, the Examiner has failed to provide a prima facie case of obviousness with regard to claims 27-31.

**Claims 32-34**

Appellants traverse the rejection of these claims on the grounds that the references are defective in establishing a prima facie case of obviousness. Appellants respectfully submit that even if combined, Shavit, Banks, and Senior clearly do not teach or suggest the limitations of claim 26, from which claims 32-34 depend.

With respect to the improper application of Shavit and Banks, the Appellants submit that Shavit, Banks, and Senior, separately or in combination, fail to teach or suggest all of the elements of claim 26 as required by MPEP § 2143. As discussed above in arguments presented for claims 1, 2, 4-12, 14-20, and 22-31, neither Shavit nor Banks discloses or suggests "a mapping database that interfaces with both the quotation database and the product database capable of storing quotation information associated with the first product," "memory connected to the quotation entry device configured to receive a mapping database record associated with the first product from the mapping database," or "a price calculator configured to access the memory to identify the quote amount associated with the first ordered product from the mapping database record, and to calculate a price for the first ordered product based on the desired quantity and the quote amount." Senior also does not disclose such features.

Senior discloses, in paragraphs 70-73, "[t]he database computer is accessible to the web computer to allow selective retrieval of commodity information which can include: product description, quantity of product to be transacted, current market price of the goods or service (commodity) to be purchased." Thus, Senior merely discloses a database that comprise product and price information. However, Senior does not disclose or suggest "a mapping database that interfaces with both the quotation database and the product database capable of storing quotation information associated with the first product." Since Senior fails to mention anything about a quotation database, Senior would not disclose or suggest a mapping database that interfaces with

the quotation database. In addition, since Senior does not disclose a mapping database, Senior would not disclose or suggest a price calculator that is configured to identify quote amount from the mapping database, let alone to calculate a price for the first ordered product based on the quote amount. For at least this reason, Senior fails to render claim 26 *prima facie* obvious. Since claims 32-34 depend and further limit claim 26, Shavit, Banks, and Senior also do not teach or suggest the limitations of claims 32-34. For at least this reason, the Examiner has failed to provide a prima facie case of obviousness with regard to claims 32-34.

**Conclusion**

Accordingly, it is respectfully submitted that the references alone or in combination do not disclose or suggest the subject matter of claims 1, 2, 4-12, 14-20, and 22-34.

For all of the foregoing reasons, it is respectfully submitted that claims 1, 2, 4-12, 14-20, and 22-34 be allowed. A prompt notice to that effect is respectfully requested.

Respectfully submitted,

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Dated: September 11, 2006

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## CLAIMS APPENDIX

1. A computer-implemented method for linking a semiconductor product manufacturing facility order with a quotation, the method comprising:

receiving the quotation including at least a first product and its quote amount;

storing the quote amount associated with the first product in a quotation database;

storing predetermined information associated with the first product in a product database;

updating a mapping database record associated with the first product with the predetermined information from the quotation database and the product database associated with the first product, wherein the mapping database associates information of the quotation from the quotation database with information of the first product from the product database;

receiving the product manufacturing facility order that identifies at least the first product and desired quantity;

retrieving a mapping database record associated with the first product from the mapping database; and

calculating an order price based on the mapping database record comprising the quote amount associated with the first product, and the desired quantity identified in the product manufacturing facility order.

2. The computer-implemented method of claim 1 wherein the product manufacturing facility is a semiconductor foundry.

4. The computer-implemented method of claim 1, wherein the product manufacturing facility order is created by a customer using a graphical user interface.

5. The computer-implemented method of claim 1, wherein the mapping database is updated automatically when the quotation database is changed.

6. The computer-implemented method of claim 1, wherein the mapping database is updated automatically when a new quotation is entered into the quotation database utilizing a database trigger.

7. The computer-implemented method of claim 1, wherein the mapping database is updated automatically when a new quotation is entered into the quotation database utilizing a auto-call function.

8. The computer-implemented method of claim 1, wherein the mapping database is updated automatically when the product database is changed.

9. The computer-implemented method of claim 1, further comprising:

receiving a quote amount for a second product;

storing the quote amount associated with the second product; and

calculating an order price associated with the second product, wherein the received product manufacturing facility order identifies at least the first product and the second product and desired respective quantities, by

accessing the stored quote amount associated with the second product, and

determining the order price for the second product based on the stored quote amount associated with the second product and the desired quantity identified in the product manufacturing facility order.

10. The computer-implemented method of claim 9, wherein the quote amount associated with the first product and the quote amount associated with the second product are in the same quotation.

11. A computer-implemented method for linking a semiconductor product manufacturing facility order with a quotation, the method comprising:

receiving the quotation including at least two products and their respective quote amounts;

storing the two quote amounts of the at least two products in a quotation database;

storing predetermined information associated with a first product and a second product of the at least two products in respective product database records in a product database;

updating respective mapping database records in a mapping database with the predetermined information from the quotation database records and the respective product database records associated with the first product and the second product, wherein the mapping database associates information of the quotation from the quotation database with information of the at least two products from the product database;

receiving the product manufacturing facility order that identifies at least the two products and their respective desired quantities;

retrieving the respective mapping database records from the mapping database; and

calculating a total order price based on the respective mapping database records comprising the two quote amounts of the at least two products, and their respective desired quantities identified in the product manufacturing facility order.

12. The computer-implemented method of claim 11, wherein the product manufacturing facility is a semiconductor foundry.

14. The computer-implemented method of claim 11, wherein the product manufacturing facility order is created by a customer using a graphical user interface.

15. The computer-implemented method of claim 11, wherein the mapping database is updated automatically when the quotation database is changed.

16. The computer-implemented method of claim 11, wherein the mapping database is updated automatically when a new quotation is entered into the quotation database utilizing a database trigger.

17. The computer-implemented method of claim 11, wherein the mapping database is updated automatically when a new quotation is entered into the quotation database utilizing a auto-call function.

18. The computer-implemented method of claim 11, wherein the mapping database is updated automatically when the product database is changed.

19. A computer-readable medium having stored thereon sequences of instruction for responding to a request for linking a semiconductor product manufacturing facility order with a quotation, the sequence of instructions including instructions for performing the steps of:

receiving the quotation including at least a first product and its quote amount;

storing the quote amount in a quotation database;

storing predetermined information associated with the first product in a product database;

updating a mapping database record associated with the first product with the predetermined information from the quotation database and the product database associated with the first product;

receiving the product manufacturing facility order that identifies at least the first product and desired quantity;

retrieving a mapping database record associated with the first product from the mapping database; and

calculating an order price based on the mapping database record comprising the quote amount associated with the first product, and the desired quantity identified in the product manufacturing facility order.

20. The computer-readable medium of claim 19, wherein the product manufacturing facility is a semiconductor foundry.

22. The computer-readable medium of claim 19, wherein the product manufacturing facility order is created by a customer using a graphical user interface.

23. The computer-readable medium of claim 19, wherein the mapping database is updated automatically when a new quotation is entered into the quotation database utilizing a database trigger

24. The computer-readable medium of claim 19, wherein the mapping database is updated automatically when a new quotation is entered into the quotation database utilizing a auto-call function.

25. The computer-readable medium of claim 19, wherein the mapping database is updated automatically when the product database is changed.

26. A system for linking a product manufacturing facility order with a quotation, the system comprising:

a quotation entry device for entering the quotation that includes at least a first product and its quote amount;

a quotation database connected to the order entry device for storing the quotation;

a product database configured to receive product information of the first product; and

a mapping database that interfaces with both the quotation database and the product database capable of storing quotation information associated with the first product;

memory connected to the quotation entry device configured to receive a mapping database record associated with the first product from the mapping database;

an order entry device for entering the product manufacturing facility order that identifies at least the first ordered product and a desired quantity; and

a price calculator configured to receive the product manufacturing facility order from the order entry device, to access the memory to identify the quote amount associated with the first ordered product from the mapping database record, and to calculate a price for the first ordered product based on the desired quantity and the quote amount.

27. The system of claim 26, wherein the product manufacturing facility is a semiconductor foundry.

28. The system of claim 26, wherein the product manufacturing facility order is created by a customer using a graphical user interface.

29. The system of claim 26, wherein the quotation database additionally comprises an automatic updating mapping database mechanism which updates the mapping database when the quotation database is changed.

30. The system of claim 26, wherein the product database additionally comprises an automatic updating mapping database mechanism which updates the mapping database when the product database is changed.

31. The system of claim 26, wherein the quotation entry device and the order entry device comprise a single device.

32. The system of claim 31, wherein the single device is a personal data assistant.

33. The system of claim 26, wherein the quotation entry device is connected to the memory via a wireless connection.

34. The system of claim 26, wherein the order entry device is connected to the price calculator via a wireless connection.

## EVIDENCE APPENDIX

There is no evidence regarding the above-identified patent application.

## RELATED PROCEEDINGS APPENDIX

There is no related proceeding regarding the above-identified patent application.